



Commonwealth of Virginia

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

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Stefanie K. Taillon
Secretary of Natural and Historic Resources

Michael S. Rolband, PE, PWD, PWS Emeritus
Director

Memorandum

Subject: Summary of Comments Received from Draft Permit Comment Period & Draft Permit Public Hearing Comment Period
Synagro Central LLC – Essex County
Virginia Pollution Abatement (VPA) Permit No. VPA00831, Modification 3

To: Trisha Beasley, Director of Operations *Trisha Beasley*

Through: Bryant Thomas, Director, Water Division *Bryant Thomas*

From: Neil Zahradka, Manager, Office of Land Application Programs *Neil Zahradka*

Date: July 30, 2025

Proposed Permit Action: Modification 3 of VPA Permit No. VPA00831

Permittee: Synagro Central LLC

Background:

DEQ issued Synagro Central LLC (Synagro) a VPA permit on July 13, 2016 that authorized Synagro to land apply biosolids on 15,331.0 acres of land in Essex County. Subsequently, Synagro applied for, and on July 16, 2019, DEQ issued a modification to the permit that removed 158.8 acres and authorized land application on an additional 4,330.1 acres. A second permit modification, dated February 18, 2020, removed 75.7 acres because the land is located in Caroline County. On October 19, 2023, DEQ received an application from Synagro to modify the permit by adding an additional 6,337.1 acres and removing 4.4 acres. As proposed, the modification would result in Synagro having a total of 25,759.3 permitted acres of land in Essex County for land application of biosolids.

Following technical review, on-site review of proposed sites, and receipt of additional information from Synagro, DEQ deemed the application technically complete on July 29, 2024.

Locality and State Agency Notice:

DEQ notified Essex County officials, as well as the Virginia Department of Health (VDH), and the Virginia Department of Conservation and Recreation (DCR), of receipt of the VPA permit application on January 16, 2024.

Public Meeting Notice:

DEQ published a public notice in the *Rappahannock Times* on October 9, 2024 announcing a public meeting in accordance with [9VAC25-32-140.B.2](#). DEQ staff sent 294 postcards to adjacent landowners notifying them of the opportunity to attend the public meeting to take place on October 17, 2024, and the opportunity to comment on the proposed permit modification. DEQ also posted notice on the agency website.

Public Meeting:

DEQ hosted a public meeting on October 17, 2024 at 6:00 pm at the Essex County School Board Office – Board Room at 109 Cross St, Tappahannock, VA 22560. Twenty-seven (27) persons attended the meeting.

At the meeting, DEQ staff provided an overview of the biosolids permitting and compliance program, the permit application, the technical review and processing timeline, and outlined the process for members of the public to submit comments on the draft permit during the subsequent public comment period. Members of the public could review maps showing existing and proposed land application sites. DEQ staff answered questions from the public, but did not record comments because it was informational only.

Preparation of Draft Permit:

DEQ staff completed the draft permit and requested Synagro review on December 12, 2024. Synagro concurred with the draft permit on December 16, 2024.

Public Notice of Draft Permit:

DEQ published a public notice in the *Rappahannock Times* on January 8, 2025 and January 15, 2025 announcing the 30-day public comment period and opportunity to request a public hearing on the draft permit. DEQ also posted notice on the agency website. The public comment period closed on February 7, 2025.

Summary of Draft Permit Public Notice Responses:

During the draft permit public comment period, DEQ received twenty-seven (27) written comments, twenty-six (26) of which contained requests for a public hearing. At the conclusion of the public comment period, DEQ reviewed all requests in accordance with § 10.1-1184.1 of the Code of Virginia and on March 10, 2025, decided to grant a public hearing.

Public Notice of Draft Permit Public Hearing:

The notice seeking public comment and announcing a public hearing was published in the *Rappahannock Times* on April 16, 2025. The notice was also distributed via email directly to those citizens requesting a public hearing. The public notice was posted on the DEQ website and the Virginia Regulatory Town Hall on April 14, 2025. The April 16, 2025 publication started a 45-day comment period which ended on June 4, 2025.

Public Hearing:

DEQ held a public hearing at 6:30 pm on May 19, 2025 at the Tappahannock-Essex Volunteer Fire Department located at 620 Airport Road, Tappahannock, VA 22560. DEQ staff conducted an information briefing immediately prior to the public hearing at 6:00 pm. Jerome Brooks, DEQ Piedmont Regional Office Director, served as the hearing officer. Approximately 40 people attended the public hearing. Synagro Central, LLC (represented by Peter Price) provided an oral

comment during the public hearing and also provided a written comment. Fourteen (14) other individuals also provided oral comments during the public hearing. Of those fourteen (14) individuals, three (3) of them also submitted written comments. Ten (10) additional written comments were received during the comment period. The draft permit public hearing public comment period closed on June 4, 2025.

Summary of Comments and DEQ Responses:

Staff conducted a review of the comments submitted during the public comment periods. The comments are summarized and categorized according to issue as shown below along with responses prepared by DEQ staff.

Summary of Comment Category 1: Water Quality

- **Commenters expressed concerns regarding potential surface water (Rappahannock River and tributaries) and groundwater contamination.**
- **One commenter had specific concerns regarding runoff from fields adjacent to Handpole Creek, a tributary to Occupacia Creek.**

DEQ Response:

DEQ developed the conditions in the permit in accordance with the VPA Permit Regulation ([9VAC25-32-30.A.](#)) to prohibit point source discharges of pollutants to surface waters, including wetlands, except in the case of a storm event greater than the 25-year, 24-hour storm.

For biosolids, the VPA Permit Regulation ([9VAC25-32-560](#)) requires the implementation of agricultural best management practices (BMPs) to reduce nonpoint source pollution from farmland. This includes restrictions on application timing, application rate, slope, and in particular, setback distances from sensitive environmental features. DEQ regulates stormwater from certain non-point agricultural sources (such as land application of biosolids) by requiring BMPs that reduce pollutant levels in the stormwater. So just like stormwater from any other source, there may be pollutants present, but the permit conditions ensure that pollutant levels are minimized, and downstream surface waters are protected.

In response to a citizen request regarding water quality protection of Handpole Creek and Occupacia Creeks, DEQ staff conducted a secondary site review on October 25, 2024 of two agricultural fields being proposed for the land application of biosolids that were originally reviewed on May 1, 2024. During the original review, DEQ staff had determined that all slopes within fields VA-EX-00010-0-0101 and -0102 were less than 15%. During an additional review, DEQ staff reviewed existing slopes and vegetative stream buffers located between the proposed land application fields and tributaries to ensure that adequate protective measures are in place to protect water quality in these tributaries. DEQ staff reviewed the adjacent fields, stopping at multiple locations along both tributaries where existing vegetative stream buffers were at their narrowest points. DEQ staff measured percent slope and vegetative stream buffer widths at these locations. The width of existing vegetative stream buffers located along these tributaries exceeded the regulatory requirement of 35 feet ([9VAC25-32-560](#)) and in all cases were more than 50 feet. Slope measurements within the existing vegetative stream buffers (outside the proposed land application fields) ranged between 7-25%. Accordingly, adequate protections exist

to protect water quality of the tributaries, and no further requirements were added to the site book identified in the permit application as EX 10.

With respect to groundwater, the conditions in the permit are based on requirements in the VPA Permit Regulation to prevent negative influences from either infiltration or runoff on groundwater. Planting and harvesting requirements are designed such that the plant root systems uptake nutrients. Runoff and infiltration are addressed through the assessment of field conditions, such as crop type, distance to groundwater, soil type, and topography. Additionally, the permit conditions include limitations on land application to sites with greater than 15% slope and require that biosolids be staged in a location selected to prevent runoff to waterways and drainage ditches.

The VPA Permit Regulation ([9VAC25-32-560.A.1.](#)) also requires that a Nutrient Management Plan (NMP) be written by a person certified by the Virginia Department of Conservation and Recreation (DCR), and that land application be conducted in accordance with the NMP. The NMP dictates the rate and timing of biosolids land application to synchronize the application rate with agronomic needs and restricts application of excess nutrients that could run off or leach to groundwater. All NMPs must be prepared in accordance with the Virginia Nutrient Management Training and Certification Regulations ([4VAC50-85](#)) and the [Virginia Nutrient Management Standards and Criteria](#).

Summary of Comment Category 2: Pollutants in Biosolids

- **The commenter expressed concerns regarding the presence and accumulation of heavy metals, pharmaceuticals, and/or associated impacts to the environment.**
- **This category also addresses concerns over the presence of pathogens, viruses and bacteria in biosolids.**

DEQ Response:

Biosolids are generated from municipal wastewater. Federal and state regulations require monitoring for nine heavy metals commonly found in biosolids and prohibit land application of material with metals concentrations above certain concentrations ([9VAC25-32-356](#)). The United States Environmental Protection Agency (EPA) addressed heavy metal accumulation in the development of the federal regulations for biosolids land application ([40 CFR Part 503](#)) and determined that as long as the concentration of heavy metals in the biosolids were below specified levels, accumulation was not problematic. The basis for this assertion is that the significant amount of organic matter contained in the biosolids acts as a sink for the small amounts of metals in the biosolids. As additional metals are introduced into the soil, so is additional organic matter to bind those metals so that they are not readily available to plants. The state and federal rules require that if biosolids contain metals above specified levels, then cumulative loading rates for Class B materials would be required. All these requirements are included in permit VPA00831.

With respect to control of pathogens such as bacteria and viruses, the conditions specified in permit VPA00831 to significantly reduce pathogens as well as the site restrictions required to protect against pathogen transfer are consistent with federal regulation ([40CFR Part 503.32\(b\)](#))

and the VPA Permit Regulation ([9VAC25-32-675.B.](#)). These conditions provide options for treatment that achieve the level of pathogen reduction required by state and federal regulation, and specify the length of time after land application that harvest of various crops may occur. In addition, the draft permit contains setback requirements more restrictive than the those in the federal regulations as specified in the VPA Permit Regulation ([9VAC25-32-560.B.3.e.\(1\)](#)). These conditions also contain provisions for extension of setbacks for individuals who may be more susceptible to infection from pathogens. DEQ follows agency guidance to grant setbacks to adjacent residents who provide a form signed by their physician, and coordinates with VDH where residents assert additional health concerns.

The constituents in biosolids that permit VPA00831 requires to be monitored, and the frequency of that monitoring, is consistent with federal regulation ([40 CFR Part 503.13](#) et seq) and the VPA Permit Regulation ([9VAC25-32-356](#) through [9VAC25-32-358](#)). The list of constituents to be monitored does not include pharmaceuticals. The required frequency is based on the amount of biosolids that is land applied from a particular source, ranging from monthly to annually, and considers the expected consistency of the residual content. Thus, the frequency of testing varies dependent upon the generating facility. VPA permits allow multiple sources of biosolids to be utilized on permitted sites, as long as the generating facility is approved by DEQ. Before a source is approved for land application in Virginia, DEQ staff reviews historical monitoring data to ensure that the material meets regulatory requirements.

The Virginia General Assembly has responded to questions regarding the safety of biosolids land application. In 2016, the Virginia General Assembly passed HJ120, which directed the Joint Legislative Audit and Review Commission (JLARC) to analyze the current scientific literature regarding the long-term effects of biosolids and industrial residuals on health, including potential impacts on well, surface, and ground water; and evaluate the regulatory requirements for land application and storage. JLARC's 2017 report, while it did recommend further study, concluded that land application of these materials according to the current regulation poses a very low or low risk to human health.

The Virginia General Assembly has taken no action on the findings of the report in subsequent sessions. In land application permits, DEQ continues to apply the requirements in state and federal regulation for reporting biosolids treatment. DEQ also continues to require 400-foot setbacks to all odor sensitive receptors, and to extend setbacks from occupied dwellings to land application sites from 200 feet to 400 feet when the occupant or owner of the dwelling submits a note from their doctor requesting such. For VPA00831, DEQ received an extended setback request for both a house and property line adjacent to Field 89-05 on the Ambrose site and required that Synagro revise the site book to delineate the extended setback. The VPA Permit Regulation includes schools in the definition of odor sensitive receptors and DEQ applies extended setbacks without the need for evaluation by a physician. DEQ also applies extended setbacks to businesses open to the public.

DEQ also solicits comments from VDH on each draft VPA permit prior to issuance. In numerous permit actions taken in recent years, VDH has not made any recommendations regarding additional restrictions on biosolids or industrial residuals use or setback extensions in their comments on permits.

The lack of change in requirements, however, is not representative of a lack of additional study. Research into the safety and use of biosolids as an agricultural soil amendment is ongoing. The Clean Water Act ([33 U.S.C. § 1345\(d\)\(2\)\(C\)](#)) requires EPA to review existing sewage sludge regulations at least every two years. The purpose of the review is to identify additional pollutants that may be present in sewage sludge, including pharmaceuticals and other contaminants of concern, and if appropriate to develop regulations for those pollutants. If EPA develops federal regulations for additional pollutants, DEQ will modify the VPA regulation accordingly. The latest review for which EPA has finalized results is 2020-2021. The results of the EPA reviews are available at <https://www.epa.gov/biosolids/biennial-reviews-sewage-sludge-standards>.

Summary of Comment Category 3: Per- and polyfluoroalkyl substances (PFAS)

- **Concerns that DEQ is failing to address the presence of PFAS or “forever chemicals” in land application of biosolids used by Synagro Central, LLC**
- **Concerns regarding how PFAS is detrimental to public health**
- **Concerns for the welfare of Essex County residents, the environment, fish and shellfish, and those who make a living on the Rappahannock River**
- **Commenters requested that the permit require PFAS testing of the material**
- **Commenters cite the results of DEQ PFAS monitoring results in the Potomac tributary Nomini Creek, and note DEQ’s acknowledgment of biosolids applied on farm fields at the headwaters of the creek**
- **Commenters reference the Draft EPA Risk Assessment for PFOA and PFOS in biosolids**
- **Commenters requested that farmers be provided more information regarding the risk of PFAS contamination from biosolids.**

DEQ Response:

Per- and polyfluoroalkyl substances (PFAS) are a family of chemicals that have been used in the manufacture of personal care products, cosmetic products, textiles, carpets, firefighting foams, paper products and food packaging. These materials may remain in biosolids following wastewater treatment. Perfluorooctanoic acid (PFOA) and perfluorooctane sulfonate (PFOS) are the most commonly detected in the environment. PFOS was phased out of production in the early 2000s in the U.S., and PFOA in 2015.

Virginia’s biosolids standards for pollutant content are contained in state regulation at [9VAC25-32-356](#). The state standards mirror federal standards at [40 CFR Part 503.13](#), which do not include requirements for PFAS monitoring or limits. DEQ will continue to apply these standards in permits until such time as state or federal action mandates changes. In the interim, DEQ is working collaboratively with VDH and following [EPA's strategies](#) to address issues related to PFAS contamination.

EPA is utilizing a risk paradigm to approach the problem of PFAS contamination. Understanding that there are gaps in the knowledge surrounding PFAS, EPA has been rapidly expanding the scientific foundation for understanding and managing the associated risk. The risk paradigm is focused on first identifying and prioritizing risk and then to take action to reduce that risk. The research is organized around:

- understanding toxicity (dose and response relationships between PFAS chemicals and both humans and ecosystems),
- understanding exposure (how are people and ecosystems being exposed, and how are chemicals moving through the environment),
- assessing risk (prioritizing and determining which exposures are most harmful), and
- identifying and planning effective treatment and remediation actions to prevent adverse effects.

EPA is at the “assessing risk” step for two PFAS in biosolids. On January 14, 2025, EPA published a [Draft Biosolids Risk Assessment for PFOA and PFOS](#), and is currently seeking public comment. The EPA draft risk assessment is a draft document, and it is not a regulatory mechanism that prescribes or requires changes in biosolids land application practices. The risk assessment is not intended to be used as a benchmark for regulatory or permit limits.

Furthermore, the risk assessment does not assess the risk for the general population, only those living on or near impacted sites. DEQ has reviewed the draft risk assessment, and notes the following:

- The risk assessment suggests that certain site management practices could serve to mitigate risk, but the draft assessment does not quantify those effects.
- Some of those mitigating practices are already included in the requirements for biosolids land application in Virginia, such as additional setbacks to surface waters and wells, minimum depth of soil above bedrock and groundwater, and the timing and rate restrictions included in nutrient management plans. These practices are not included in the modeling for the draft risk assessment.
- The average land application rates applied in Virginia are approximately one-third of the loading modeled in the risk assessment.

The comment period on the draft risk assessment has been extended until August 14, 2025. The EPA will then determine the next steps. This commitment was reaffirmed by EPA Administrator Zeldin in a statement on April 28, 2025: that EPA will “Finish [the] public comment period for [the] biosolids risk assessment and determine [the] path forward based on comments.”

Regarding the information provided to landowners receiving biosolids on their property, DEQ requires that Synagro provide a DEQ Biosolids Fact Sheet to the landowner. The current Biosolids Fact Sheet includes a reference to EPA’s work to determine if the presence of other constituents in land applied materials would warrant further testing requirements before land application. DEQ will update the Fact Sheet to be consistent with any additional information once the EPA Biosolids Risk Assessment for PFOA and PFOS is finalized.

Regarding Nomini Creek, DEQ has been monitoring PFAS in waterbodies across the Commonwealth since 2021. While biosolids land application may occur in a monitored watershed, DEQ has not determined that PFAS levels in the monitored waters are the result of biosolids land application. Monitoring results are summarized, and data is available for download in the agency’s [PFAS dashboard](#). In 2024, DEQ collected PFAS surface water samples at the agency’s freshwater and estuarine probabilistic monitoring sites (probabilistic monitoring sites are randomly selected sampling locations established to provide an unbiased regional or statewide characterization of water resources with a known degree of statistical confidence).

Two of the estuarine probabilistic sites fell within Nomini Bay. Station 1ANOM000.51 is located near the mouth of Nomini Bay and station 1ABUB000.94 is on Nomini Bay – Buckner Creek. A summary of surface water results for each station is below.

Station ID: 1ABUB000.94 Waterbody Name: Nomini Bay – Buckner Creek Sample Date: 07/18/2024	
Analyte	Concentration (ppt)
Total PFAS	4.93
PFOA	2.47
PFOS	2.46
PFBS	< 2
HFPO-DA (GenX)	< 10
A less than symbol indicates that the value is less than the minimum level of quantitation (ML).	

Station ID: 1ANOM000.51 Waterbody Name: Nomini Bay Sample Date: 07/18/2024	
Analyte	Concentration (ppt)
Total PFAS	4.68
PFOA	2.06
PFOS	2.62
PFBS	< 2
HFPO-DA (GenX)	< 10
A less than symbol (<) indicates that the value is less than the minimum level of quantitation (ML).	

The EPA has set drinking water maximum contaminant levels (MCL) values for 5 individual PFAS and a group of 4 PFAS in a mixture. The MCLs for PFOA and PFOS is set at 4 parts per trillion (ppt) each, and the MCL for HFPO-DA is set at 10 ppt. PFBS does not have an individual MCL, it is regulated only when in a mixture with PFNA, PFHxS, HFPO-DA. To calculate the MCL of the mixture, the concentration of each PFAS is divided by a “Health-Based Water Concentration” and summed together. The Health-Based Water Concentration for PFBS is 2000 ppt, and the Health-Based Water Concentration for the other PFAS are their MCLs (10 ppt). The MCL values represent the maximum level these chemicals are allowed in drinking water. While the area of interest is not used for drinking water, the MCL values provide context for the observed concentrations in the Nomini (Buckner Creek) area.

If additional changes to the state or federal regulatory requirements arise from the biennial EPA review of the sewage sludge regulations, EPA’s PFAS strategy, or other state or federal action, DEQ has the authority under [9VAC25-32-220.A.2](#) of the VPA Permit Regulation to reopen the permit and modify it based on such new information. The permit contains a reopener clause at

Part I.J.9 to effect such changes, and to amplify DEQ's intent to modify the permit based on future PFAS requirements, the reopener clause was amended as follows:

9. The department will modify or, alternatively, revoke and reissue this permit as appropriate and necessary to incorporate changes to any applicable standard or requirement, including those related to per- and polyfluoroalkyl substances, for the use or disposal of biosolids, industrial wastewater sludge, or septage promulgated under Section 405(d) of the Clean Water Act, the State Water Control Law, or 9VAC 25-32-10, et seq., of the Virginia Pollutant Abatement Permit Regulation.

Summary of Comment Category 4: Biosolids from Maryland

- **Commenters expressed concern that PFAS contaminated sources of biosolids are being shipped to Virginia from Maryland to be land applied and stated that Maryland had banned the land application of these biosolids in Maryland.**
- **Commenters also requested a temporary halt of land application of biosolids from Maryland.**
- **One commenter questioned why Virginia would allow Maryland biosolids to be land applied in Virginia if there was not enough capacity for disposal in Virginia.**
- **Comments state DEQ has authority to require PFAS testing.**

DEQ Response:

The DEQ list of approved sources of biosolids which may be applied in Virginia currently contains 22 wastewater treatment facilities from Maryland. DEQ reviews metals data, pathogen reduction data, and vector attraction reduction process data for each of those sources to ensure that they meet the Virginia and federal requirements for land application. DEQ does not apply any additional Maryland PFAS guidelines to material land applied in Virginia. The Maryland sources have been land applied in Virginia for several years, with the average amount land applied annually from all Maryland sources on Virginia farms averaging approximately 24,000 dry tons per year.

On May 6, 2025, DEQ obtained the latest PFAS analysis data available from the Maryland Department of the Environment (MDE) for each of the 22 facilities and compared those data to the [PFAS land application guidelines published by MDE](#). These guidelines are recommendations from MDE and are not regulations. Maryland has not banned land application of any Maryland biosolids, and has lifted the pause on permit modifications allowing additional land application sites. This pause on permit modification processing was only in effect for a limited period of time during 2024. All of the Maryland biosolids sources approved for land application in Virginia meet MDE's criteria to be land applied in Maryland at a rate of at least 3.0 dry tons per acre.

DEQ does not have regulatory or statutory authority to prohibit biosolids sources based on the state of origin. If biosolids sourced from another state meets Virginia requirements, those biosolids may be land applied in Virginia. With respect to the question of adequate capacity for disposal of Virginia's sewage sludge, DEQ staff stated during the informational briefing prior to the public hearing that there was not enough landfill or incinerator capacity to dispose of all the

sewage sludge managed in Virginia; however, there is more than enough land application area available in Virginia for the amount of biosolids produced in Virginia.

Regarding DEQ's authority to require additional testing and prohibit biosolids land application based on PFAS content, [9VAC25-32-315](#) of the VPA Permit Regulation authorizes DEQ to impose requirements for the use of biosolids or the disposal of sewage sludge in addition to or more stringent than the requirements in [Part IX of the VPA Permit Regulation](#) when necessary to protect human health and the environment from any adverse effect of a pollutant in the biosolids or sewage sludge. Given the state of the science and understanding of health risks from possible exposure to PFAS, it is not clear what specific requirements related to PFAS are necessary to achieve these goals, thus DEQ is following the directives of EPA and the Virginia General Assembly.

Summary of Comment Category 5 – Benefits of biosolids land application/Support permit

- **Comments note the benefits of biosolids such as:**
 - **improvement of soil health**
 - **structure and moisture retention through the added organic matter**
 - **recycling of material instead of sending to a landfill**
 - **financial savings due to not purchasing as much commercial fertilizer**
 - **using an organic fertilizer rather than a chemical fertilizer; and improved vegetative growth**
- **Comments note that PFAS is present in biosolids because significant concentrations of PFAS exist in the system contributing to wastewater flow, including consumer products made with PFAS and resulting concentrations in human blood and urine**
- **Banning biosolids land application will not change overall PFAS exposure**
- **Lack of significant difference between PFAS concentrations in soil receiving biosolids applications versus and soil that did not**
- **PFAS contributions from rainwater**
- **Commenters requested that DEQ approve the permit modification**

DEQ Response:

DEQ concurs that research from multiple academic institutions including [Virginia Tech](#) and the [United States Department of Agriculture Multi-State Research Project W-5170](#) cites the agronomic benefits noted in the comments. DEQ acknowledges the comments supporting the permit modification.

Summary of Comment Category 6 – Request to deny the permit.

- **Commenters assert that because PFAS has been identified in surface waters and in the biosolids sources proposed to be land applied, that expanding land application area would expand PFAS contamination, thus DEQ should deny the permit**

DEQ Response:

DEQ has reviewed the application submitted by Synagro and determined that it contains all the information required by applicable law and regulation. DEQ staff have visited the proposed application sites and determined that they meet the applicable technical requirements. DEQ has processed the permit application and prepared a permit that contains all the criteria required by the state and federal regulations designed to protect human health and the environment. Considering these facts, DEQ has no basis upon which to deny or delay modification of the VPA permit.

Commenter Listing

The table below lists the commenters who submitted comments during the draft permit public comment period and includes the category or categories of comments associated with the commenter.

Comments Submitted During Public Comment Period to the Draft Permit January 8, 2025 – February 7, 2025				
Name	Type	Date Received	Categories	Request for Public Hearing
Mike Lightfoot	Email	1/29/2025	1,3	Yes
Pamela Hicks	Email	2/2/2025 & 2/5/2025	3	Yes
J C Hudgins	Email	2/3/2025	1,3	Yes
Rappahannock Tribe of Virginia	Email	2/3/2025	1,3,6	Yes
Monica Schenemann	Email	2/4/2025 & 2/6/2025	3	Yes
Jeff Schenemann	Email	2/4/2025	3	Yes
Lee Deihl	Email	2/5/2025	3	Yes
Mike Brookover	Email	2/5/2025	3	Yes
Cheree Brookover	Email	2/5/2025	3	Yes
Daniel Knott	Email	2/5/2025	2,3	No
Kevin Salmon	Email	2/6/2025	3	Yes
Phyllis Jones	Email	2/6/2025	3	Yes
Jennifer Durrer	Email	2/6/2025	3	Yes
Scotty Abbott	Email	2/6/2025	3	Yes
Edward Arnest	Email	2/6/2025	3	Yes
Hank Lavery	Email	2/6/2025	1,3	Yes
Bonnie Miller	Email	2/6/2025	3	Yes
Collin Huber	Email	2/6/2025	3	Yes
Danny Crabbe	Email	2/6/2025	3	Yes
Logan Nitzey	Email	2/6/2025	1	Yes
Lea Henderson	Email	2/6/2025	3	Yes
Jeff Stonehill	Email	2/7/2025	3	Yes
Emory Rice	Email	2/7/2025	3	Yes
A J Erskine	Email	2/7/2025	1,3	Yes
Tommy Kellum	Email	2/7/2025	3	Yes
Jason Alderman	Email	2/7/2025	3	Yes
Carol Muratore	Email	2/7/2025	3	Yes

The table below lists the commenters who submitted comments during the public hearing comment period and includes the category or categories of comments associated with the commenter.

Comments Submitted During Public Comment Period to the Draft Permit Public Hearing April 16, 2025 – June 4, 2025				
Name	Type	Date Received	Categories	Support or Oppose Modification
Walter Malloy	Written	5/19/2025	2	Oppose
Sarah Lavicka	Written, Oral Comment at Hearing	5/19/2025	3,4,6	Oppose
Rappahannock Tribe of Virginia	Written	5/19/2025	3,4,6	Oppose
Synagro Central, LLC (Peter Price)	Written, Oral Comment at Hearing	5/19/2025	5	Support
Jay Hundley	Written	5/19/2025	5	Support
Donnie Thomas	Written	5/19/2025	5	Support
John N Mills	Written	5/19/2025	5	Support
Bayse Gillions	Written	5/19/2025	5	Support
Kevin Engel	Written	5/19/2025	5	Support
Hugh Townsend	Written	5/19/2025	5	Support
Mike Lightfoot	Oral Comment at Hearing, Written, Written	5/19/2025, 5/20/2025, 6/3/2025	1,3,4,6	Oppose
Lee Deihl	Oral Comment at Hearing	5/19/2025	1,3,4	Oppose
Tommy Kellum	Oral Comment at Hearing	5/19/2025	1,3,4	Oppose
Brent Hunsinger	Oral Comment at Hearing	5/19/2025	1,3	Oppose
James Fatouhi	Oral Comment at Hearing	5/19/2025	5	Support
Hill Welford	Written, Oral Comment at Hearing	5/19/2025, 6/2/2025	1,3	Oppose
Dean Naujoks	Oral Comment at Hearing	5/19/2025	3,4,6	Oppose
Robert Crockett	Oral Comment at Hearing	5/19/2025	5	Support
Monica Schenemann	Oral Comment at Hearing	5/19/2025	3	Oppose
Jack Ryan	Oral Comment at Hearing	5/19/2025	1,3,6	Oppose
Brian Oliff	Oral Comment at Hearing	5/19/2025	3	Oppose
Robert Hinton	Oral Comment at Hearing	5/19/2025	3,4,6	Oppose
Lake Cowart	Oral Comment at Hearing	5/19/2025	3,4,6	Oppose
Austin Parks	Written	6/1/2025	3,6	Oppose
Nancy Armour	Written	6/3/2025	3,4,6	Oppose